

Section 1. Registration Information

Source Identification

Facility Name:	Univar USA Inc.
Parent Company #1 Name:	Univar USA Inc.
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	Revised OCA due to change (40 CFR 68.190(b)(6))
Description:	Phoenix, AZ
Receipt Date:	04-Nov-2011
Postmark Date:	04-Nov-2011
Next Due Date:	04-Nov-2016
Completeness Check Date:	04-Nov-2011
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0007 8275
Other EPA Systems Facility ID:	85043VNWTR50S45

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	
Parent Company #1 DUNS:	102971785
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	50 South 45th Avenue
Street 2:	
City:	Phoenix
State:	ARIZONA
ZIP:	85043
ZIP4:	3907
County:	MARICOPA

Facility Latitude and Longitude

Latitude (decimal):	33.446944
Longitude (decimal):	-112.158056
Lat/Long Method:	Interpolation - Photo
Lat/Long Description:	Center of Facility
Horizontal Accuracy Measure:	25
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	24000

Owner or Operator

Operator Name:	Pamela Russ
Operator Phone:	(602) 272-3272

Mailing Address

Operator Street 1:	50 South 45th Avenue
Operator Street 2:	
Operator City:	Phoenix
Operator State:	ARIZONA
Operator ZIP:	85043
Operator ZIP4:	3907
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Michael Trapasso
RMP Title of Person or Position:	Operations Manager
RMP E-mail Address:	michael.trapasso@univarusa.com

Emergency Contact

Emergency Contact Name:	Michael Trapasso
Emergency Contact Title:	Operations Manager
Emergency Contact Phone:	(602) 272-3272
Emergency Contact 24-Hour Phone:	(800) 424-9300
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	michael.trapasso@univarusa.com

Other Points of Contact

Facility or Parent Company E-mail Address:	michael.trapasso@univarusa.com
Facility Public Contact Phone:	(602) 272-3272
Facility or Parent Company WWW Homepage Address:	www.univarusa.com

Local Emergency Planning Committee

LEPC:	Maricopa County LEPC
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Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	50
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	
Air Operating Permit ID:	

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	18-Oct-2010
Last Safety Inspection Performed By an External Agency:	Phoenix Fire Department

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:
Preparer Phone:
Preparer Street 1:
Preparer Street 2:
Preparer City:
Preparer State:
Preparer ZIP:
Preparer ZIP4:
Preparer Foreign State:
Preparer Foreign Country:
Preparer Foreign ZIP:

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.
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Process Chemicals

Process ID:	1000030005
Description:	Containerized Storage
Process Chemical ID:	1000035989
Program Level:	Program Level 2 process
Chemical Name:	Hydrogen fluoride/Hydrofluoric acid (conc 50% or greater) [Hydrofluoric acid]
CAS Number:	7664-39-3
Quantity (lbs):	6000
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	1000030005
Process NAICS ID:	1000030327
Program Level:	Program Level 2 process
NAICS Code:	42469
NAICS Description:	Other Chemical and Allied Products Merchant Wholesalers

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000024896

Percent Weight:	70.0
Physical State:	Liquid
Model Used:	EPA's RMP*Comp(TM)
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:
Enclosures:
Berms:
Drains:
Sumps:
Other Type:

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000026705

Percent Weight:	70.0
Physical State:	Liquid
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Urban

Passive Mitigation Considered

Dikes:
Enclosures:
Berms:
Drains:
Sumps:
Other Type:

Active Mitigation Considered

Sprinkler System:
Deluge System:
Water Curtain:
Neutralization:
Excess Flow Valve:
Flares:
Scrubbers:
Emergency Shutdown:
Other Type:

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

No records found.

Section 7. Program Level 3

Section 8. Program Level 2

Description:

Warehouse storage and handling of factory-packaged UN specification shipping containers.

Program Level 2 Prevention Program Chemicals

Prevention Program Chemical ID:	1000021135
Chemical Name:	Hydrogen fluoride/Hydrofluoric acid (conc 50% or greater) [Hydrofluoric acid]
Flammable/Toxic:	Toxic
CAS Number:	7664-39-3
Prevention Program Level 2 ID:	1000020829
NAICS Code:	42469

Safety Information

Safety Review Date (The date of the most recent review or revision of the safety information):	12-May-2008
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Safety Compliance Regulations or Design Codes/Standards

NFPA 58 (or state law based on NFPA 58):	Yes
OSHA (29 CFR 1910.111):	
ASTM Standards:	
ANSI Standards:	
ASME Standards:	
None:	
Other Regulation, Design Code, or Standard:	UN specification containers (USDOT)
Comments:	

Hazard Review

Hazard Review Date (The date of completion of most recent review or update):	14-May-2008
Change Completion Date (The expected or actual date of completion of all changes resulting from the hazard review):	27-Apr-2009

Major Hazards Identified

Toxic Release:	Yes
Fire:	
Explosion:	
Runaway Reaction:	
Polymerization:	
Overpressurization:	
Corrosion:	
Overfilling:	
Contamination:	
Equipment Failure:	
Loss of Cooling, Heating, Electricity, Instrument Air:	

Earthquake:
Floods (Flood Plain):
Tornado:
Hurricanes:
Other Major Hazard Identified:

Process Controls in Use

Vents:
Relief Valves:
Check Valves:
Scrubbers:
Flares:
Manual Shutoffs:
Automatic Shutoffs:
Interlocks:
Alarms and Procedures: Yes
Keyed Bypass:
Emergency Air Supply:
Emergency Power:
Backup Pump:
Grounding Equipment: Yes
Inhibitor Addition:
Rupture Disks:
Excess Flow Device:
Quench System:
Purge System:
None:
Other Process Control in Use: Training and SOPs

Mitigation Systems in Use

Sprinkler System: Yes
Dikes: Yes
Fire Walls: Yes
Blast Walls:
Deluge System:
Water Curtain:
Enclosure: Yes
Neutralization: Yes
None:
Other Mitigation System in Use:

Monitoring/Detection Systems in Use

Process Area Detectors:
Perimeter Monitors:
None: Yes
Other Monitoring/Detection System in Use:

Changes Since Last PHA or PHA Update

Reduction in Chemical Inventory: Yes
Increase in Chemical Inventory:
Change Process Parameters:

Installation of Process Controls:

Installation of Process Detection Systems:

Installation of Perimeter Monitoring Systems:

Installation of Mitigation Systems:

None Recommended:

None:

Other Changes Since Last PHA or PHA Update: Hazard review recommendations fully implemented.

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 19-May-2009

Training

Training Review Date (The date of the most recent review or revision of training programs): 19-Jan-2009

The Type of Training Provided

Classroom: Yes

On the Job: Yes

Other Training:

The Type of Competency Testing Used

Written Tests: Yes

Oral Tests:

Demonstration: Yes

Observation: Yes

Other Type of Competency Testing Used:

Maintenance

Maintenance Review Date (The date of the most recent review or revision of maintenance procedures): 27-Apr-2009

Equipment Inspection Date (The date of the most recent equipment inspection or test): 11-Mar-2009

Equipment Most Recently Inspected or Tested: Forklift, drum picker, dock leveler, trailer stand

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit): 13-Oct-2011

Audit Completion Date (The expected or actual date of completion of all changes resulting from the compliance audit): 15-Apr-2013

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Changes Date (Expected or actual date of completion of all changes resulting from the investigation):

Facility Name: Univar USA Inc.

EPA Facility Identifier: 1000 0007 8275

Plan Sequence Number: 1000024537

Most Recent Change Date: (The date of the most recent change that triggered a review or revision of safety information): 27-Apr-2009

Confidential Business Information

CBI Claimed:

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?): Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?): Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?): Yes

Healthcare (Does facility's ER plan include information on emergency health care?): Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan): 06-Apr-2010

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees): 18-Apr-2011

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): Phoenix Fire department

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (602) 262-6334

Subject to

OSHA Regulations at 29 CFR 1910.38:
OSHA Regulations at 29 CFR 1910.120: Yes
Clean Water Regulations at 40 CFR 112:
RCRA Regulations at CFR 264, 265, and 279.52:
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:
State EPCRA Rules or Laws: Yes
Other (Specify):

Executive Summary

1. Accidental Release Prevention and Emergency Response Policies

At Univar USA Inc. (Univar) we are strongly committed to employee, public and environmental safety. This commitment is demonstrated by our comprehensive accidental release prevention program that covers areas such as design, installation, operating procedures, maintenance, and employee training associated with the processes at our facility. It is our policy to implement appropriate controls to prevent possible releases of regulated substances.

2. The Stationary Source and the Regulated Substances Handled

Univar is a wholesale chemical distributor serving a number of U.S. industries. Founded in 1924, the company supplies the food industry, chemical compounders, pharmaceuticals, mining, forest products, oil and gas producers, electronics, coatings, public utilities and many other key industries with the chemical raw materials required to produce or refine products used in numerous end-use markets.

Univar is an active and long-term member of the National Association of Chemical Distributors (NACD) and complies with the Responsible Distribution Process (RDP), an environmental, health and safety improvement initiative.

Our facility's primary activities encompass the blending, repackaging, bulk and warehouse storage of chemicals, and their distribution to local industries via Univar's fleet of delivery trucks or by one of our approved common carriers. One of the chemicals stored and handled at our facility, hydrofluoric acid >50%, is subject to EPA's Risk Management Program rule (40 CFR Part 68). This product is delivered to our facility by common carrier truck in sealed, factory packaged, UN Specification containers (55-gallon drums) and stored in our warehouse until distributed to end-use customers. We warehouse hydrofluoric acid in its original factory-packaged sealed containers, and do not open, use or repackage the material in any way prior to sale. We must maintain sufficient inventory of hydrofluoric acid to meet customer demand, but for safety and business reasons we also attempt to maintain those levels as low as possible. A key requirement of EPA's RMP rule is the preparation and submission of a Risk Management Plan, contained herein. The contents of the RMP Plan are prescribed by EPA, including this Executive Summary.

3. The General Accidental Release Prevention Program and the Chemical-Specific Prevention Steps

Our facility has taken all the necessary steps to comply with the accidental release prevention requirements set forth in 40 CFR Part 68. This facility was designed and constructed in accordance with NFPA-58 Standard, 1967 Edition. The following sections briefly describe the elements of the general release prevention program that is in place at our stationary source.

Process Safety Information

Univar maintains a detailed record of safety information that describes the chemical hazards, operating parameters and equipment designs associated with all processes.

Process Hazard Analysis (PHA)

Our facility conducts comprehensive studies to ensure that hazards associated with our processes are identified and controlled efficiently. The methodology used to carry out these analyses is the "What If" method. The studies are undertaken by a team of qualified personnel with expertise in process safety management and process operations and are revalidated at a regular interval of five years. Any findings related to the hazard analysis are addressed in a timely manner. The most recent PHA was performed on 05/14/2008.

Operating Procedures

For the purposes of safely conducting activities within our covered processes, Univar maintains written operating procedures. These procedures address various modes of operation such as startup, normal operations, emergency shutdown, emergency operations, normal shutdown and startup after a turnaround. The information is reviewed and certified as being current at least annually and is readily accessible to operators involved in the processes. The most recent review/update of operating procedures was completed on 9/28/2011.

Training

Univar has a comprehensive training program in place to ensure that employees who are operating processes are competent in the

operating procedures associated with these processes. All new employees receive their initial training within 90-days of hire. Refresher training is provided at various intervals, but typically between one and three years, depending on the subject matter.

Mechanical Integrity

Univar and our contractors conduct documented maintenance checks on process equipment to ensure safe operations. Process equipment examined by these checks includes among others, forklifts, storage tanks, piping systems, relief and vent systems, emergency shutdown systems, controls and pumps. Maintenance operations are carried out by qualified personnel with previous training in maintenance practices. Furthermore, these personnel are offered specialized training as needed. Any equipment deficiencies identified by the maintenance checks are corrected in a safe and timely manner. The most recent review/revision of our maintenance procedures was performed on 04/27/2009.

Management of Change

Written procedures are in place at Univar to manage changes in process chemicals, technology, equipment and procedures. Process operators, maintenance personnel or any other employee whose job tasks are affected by a modification in process conditions are promptly made aware of and provided training to deal with the modification.

Pre-startup Reviews

Pre-start up safety reviews related to new processes and to modifications in established processes are conducted as a regular practice at Univar. These reviews are conducted to confirm that construction, equipment, operating and maintenance procedures are suitable for safe startup prior to placing equipment into operation.

Compliance Audits

Univar conducts audits on a regular basis to determine whether the provisions set forth by the RMP rule are being implemented. These audits are carried out at least every 3 years and any corrective actions required as a result of the audits are undertaken in a safe and prompt manner. The most recent compliance audit pertaining to process safety/RMP Plan was conducted on 10/13/2011.

Incident Investigation

Univar promptly investigates any incident that has resulted in, or could reasonably result in a catastrophic release of a regulated substance. These investigations are undertaken to identify the situation leading to the incident as well as any corrective actions to prevent the release from reoccurring. All reports are retained for a minimum of 5 years.

Employee Participation

Univar believes that process safety management and accident prevention is a team effort. Company employees are strongly encouraged to express their views concerning accident prevention issues and to recommend improvements. In addition, our employees have access to all information created as apart of the facility's implementation of the RMP rule, including information resulting from process hazard analyses in particular.

Contractors

Univar may hire contractors to conduct specialized maintenance and construction activities. Prior to selecting a contractor, a thorough evaluation of safety performance of the contractor is carried out. Univar has a strict policy of informing the contractors of known potential hazards related the contractor's work and the processes. Contractors are also informed of all the procedures for emergency response should an accidental release of a regulated substance occur. Following evaluation, selection and completion of the initial job, each contractor's performance is rated by a senior-level operations manager. Any contractor whose performance is rated as unsatisfactory is subject to disqualification from further work.

Chemical-specific prevention steps undertaken at our facility include the following:

- !Maintaining minimal inventory
- !Developing Standard Operating Procedures on safe handling of the material and reviewing annually to ensure they are maintained up-to-date
- !Emergency response training and equipment to minimize the impact of a release
- !Storage and handling of the material in appropriate and sealed UN Specification containers, and in designated locations based on compatibility and safety considerations
- !Material remains in its original sealed factory packaging & containers are not opened for any reason

4.Five-year Accident History

Our facility has had an excellent record of preventing accidental releases over the last 5 years. Due to our stringent release prevention policies, comprehensive operating procedures and frequent training, there have been no accidental releases of hydrofluoric acid.

5.Emergency Response Plan

Univar carries a written emergency response plan to deal with accidental releases of hazardous materials. The plan includes all aspects of emergency response including adequate first aid and medical treatment, evacuations, notification of local emergency response agencies and the public, as well as post-incident decontamination of affected areas.

To ensure proper functioning, our emergency response equipment is regularly inspected and serviced. In addition, the plan is promptly updated to reflect any pertinent changes taking place within our processes that would require a modified emergency response. The most recent update/revision of the emergency response plan for our facility was on 04/06/2009.

Our emergency plan has been coordinated and verified with the City of Phoenix Fire Department, which is the primary local emergency response agency, as well as with the Maricopa County Local Emergency Planning Committee (LEPC) and City of Phoenix Police Department. Updates to this plan are distributed to appropriate local emergency response organizations. Additionally, joint training and practice drills with the Phoenix Fire Department have been conducted, as well as annual site visits by the fire department to ensure they remain familiar with our facility and processes.

6.Planned Changes to Improve Safety

Several recommendations to prevent or further mitigate the potential for releases of hydrofluoric acid during storage or handling resulted from the hazard review (PHA) that was conducted as part of our prevention program. As a result, some of the major steps taken recently to improve safety at our facility included:

- Amending our operating procedures to require that a tractor be connected to trailer during the unloading and loading process
- Increasing the level of security by installing redundant vehicle entrance/exit gates and additional upgraded surveillance equipment
- Amending our operating procedure to require outbound deliveries of hydrofluoric acid ship on van trailers only
- Amending the Inspection and P.M. Program to expand the scope of equipment covered
- Developing and implementing a truck loading safety checklist and requiring its use by loaders and drivers
- Amending our operating procedures to prohibit Will Calls of hydrofluoric acid
- Instituting a policy to provide material handlers with a Gatorade-type drink to reduce the potential for suffering heat exhaustion or heat stroke while working on the job

The above changes were implemented by April 27, 2009.